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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THYBO ASSET MANAGEMENT LIMITED; and
THYBO STABLE FUND LTD.,

Defendants.

Adv. Pro. No. 09-01365 (SMB)

**CERTIFICATE OF NO OBJECTION OF TRUSTEE'S MOTION FOR
ENTRY OF ORDER PURSUANT TO SECTION 105(a) OF THE
BANKRUPTCY CODE AND RULES 2002 AND 9019 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE APPROVING A SETTLEMENT
BY AND AMONG THE TRUSTEE, THYBO ASSET MANAGEMENT LIMITED AND
THYBO STABLE FUND LTD.**

Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* ("SIPA") and the estate of Bernard L. Madoff ("Madoff"), by and through his undersigned counsel, submit this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On October 23, 2015, the Trustee filed the Motion for Entry of an Order Pursuant to Section 105(a) of the Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure Approving a Settlement Agreement by and Among the Trustee, Thybo Asset Management Limited and Thybo Stable Fund Ltd. (the "Motion") (09-01365, ECF 92; 08-01789, ECF 11885).

2. The deadline for filing objections to the Motion expired on November 11, 2015 at 5:00 p.m. A hearing on the Motion has been scheduled for November 18, 2015 at 10:00 a.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) defendants to each adversary proceeding; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after

expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of a proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: New York, New York
November 13, 2015

By: /s/Elizabeth A. Scully
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--and--

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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Estate of Bernard L. Madoff*